

David R. Boyajian, OSB #112582
Email: dboyajian@schwabe.com
SCHWABE, WILLIAMSON & WYATT, P.C.
1211 SW 5th Ave., Suite 1900
Portland, OR 97204
Telephone: 503.222.9981
Facsimile: 503.796.2900

Attorneys for Plaintiff Langlois Enterprises, Ltd.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

LANGLOIS ENTERPRISES LTD.,

No. 3:24-cv-00921

Plaintiffs,

vs.

**M/V GLORY, IMO No. 9288473, her
engines, tackle, appurtenances, etc., *in
rem*, and PRIMERA SHIPPING
INCORPORATED, as Owners of the M/V
GLORY,**

Defendants

MOTION FOR APPOINTMENT OF
SUBSTITUTE CUSTODIAN

Plaintiff LANGLOIS ENTERPRISES LTD., moves this Court for an Order directing that the United States Marshal for this District be ordered to transfer custody of the vessel, M/V GLORY (IMO 9288473) (hereafter, the “Vessel”), to the custody of substitute custodian Marine Lenders Services, LLC, by and through its authorized representatives, immediately following attachment of the vessel. As more fully described in the Affidavit of Buck Fowler, Jr., the

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CUSTODIAN

SCHWABE, WILLIAMSON & WYATT, P.C.
Attorneys at Law
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Fax: 503.796.2900

Managing Member of the proposed substitute custodian, Marine Lenders Services, LLC has agreed to act as substitute custodian of the Vessel in lieu of the U.S. Marshal and to serve as substitute custodian while the property remains in *custodia legis*, and until further order of the Court.

The substitute custodian will maintain legal liability insurance. Plaintiff requests that the expenses of the U.S. Marshal, the plaintiff, and the substitute custodian in safekeeping and maintaining the vessel while in *custodia legis*, including, but not limited to, insurance premiums and all other sums and advances, be declared administrative expenses herein, to be paid prior to the release of the defendant vessel or distribution of the proceeds of its sale, all in accordance with the rule of *New York Dock Co. v. Steamship Poznan*, 274 U.S. 117 (1927).

This Motion is based upon the Declaration of Buck Fowler, Jr., the proposed Order filed herewith, and the pleadings and papers filed herein.

Dated this 10th day of June, 2024.

Respectfully submitted,

SCHWABE, WILLIAMSON & WYATT, P.C.

By: s/ David R. Boyajian
David R. Boyajian, OSB #112582
dboyajian@schwabe.com
Telephone: 503.222.9981
Facsimile: 503.796.2900
Attorneys for Plaintiff Langlois Enterprises,
Ltd